

October 4, 2010

Via Facsimile and by Hand

Honorable Shira Scheindlin  
U.S. District Judge  
United States District Court for the Southern  
District of New York  
500 Pearl Street  
New York, New York 10007-1312

this action is restored to  
my active docket. The  
plaintiff shall file  
the amended complaint  
forthwith, as provided  
by the attached  
stipulation.

So ordered:  
*[Signature]*  
Shira A. Scheindlin  
USDJ  
10/5/10

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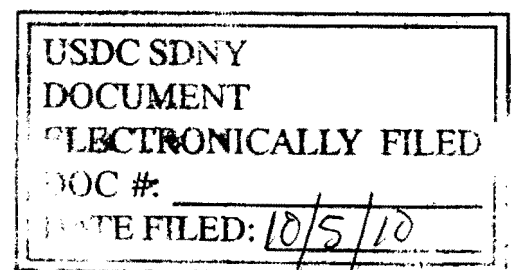
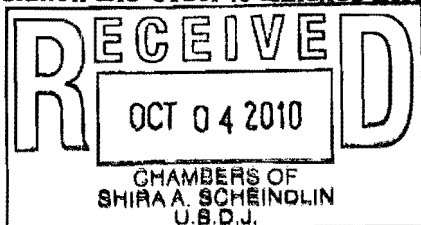
Re: *Ventura Content, AVV v. Mansef, Inc., et al., No. 10 Civ. 1149 (SAS)*

Dear Judge Scheindlin:

We are pleased to report that the parties in the above referenced action (the "Action") have reached a settlement reflected in the confidential agreement executed today by the parties (the "Agreement").

In connection with the terms of the Agreement, the parties respectfully seek the Court's assistance as follows:

1. Plaintiff requests that the Court reinstate the Action as provided for under the Court's Order of Discontinuance dated September 22, 2010.
2. With the consent of all parties and subject to the approval of the Court, Plaintiff will immediately file an amended complaint adding three additional parties to the Action who currently own and/or provide services to the websites at issue in the Action, and Defendants shall immediately file an Amended Answer thereafter. A copy of the parties' executed stipulation consenting to the filing of the Second Amended Complaint is annexed hereto.
3. In accordance with the terms of the Agreement, the parties shall promptly enter into an Escrow Agreement providing for the payment by Defendants of certain funds into an escrow account. Immediately upon receipt of such funds, the parties shall advise the Court and request that it enter the Stipulation and Order for the Dismissal of the Action with Prejudice with the Court retaining jurisdiction solely to enforce the terms of the Agreement, which will be submitted to the Court as directed so as to preserve its confidentiality. The form of this Stipulation and Order is annexed hereto.



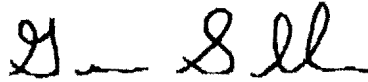
The Honorable Shira Scheindlin

October 4, 2010

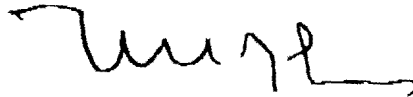
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We very much appreciate the Court's time and consideration in allowing the parties to reach an amicable resolution of the Action. We stand ready to address any of the foregoing matters, as needed, at the convenience of the Court.

Respectfully submitted,



Gianni P. Servodidio  
*Counsel for Plaintiff*



Michael J. Lane  
*Counsel for Defendants*

Encl.

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VENTURA CONTENT, AVV,

Plaintiff,

v.

MANSEF INC d/b/a MANSEF PRODUCTIONS,  
INC.; 6721851 CANADA INC d/b/a INTERHUB,  
INC.

Defendants.

Docket No. 10 Civ. 1149 (SAS)

**STIPULATION AND ORDER OF  
CONSENT TO FILING OF  
AMENDED COMPLAINT**

WHEREAS: Plaintiff Ventura Content, AVV filed this action on February 11, 2010; and

WHEREAS: On or around March 1, 2010 Defendants Mansef Inc. and 6721851 Canada Inc. engaged in the sale of all or substantially all of their assets to D.C.I. Daily Capital Investment and Froytal Services Limited; and

WHEREAS: 9219-1568 Quebec Inc. renders services for the benefit of DCI Daily Capital Investment; and

WHEREAS: Mansef, Inc., 6721851 Canada Inc., D.C.I. Daily Capital Investment, Froytal Services Limited, and 9219-1568 Quebec Inc. have had an opportunity to review the Second Amended Complaint in this action attached hereto as Exhibit A;

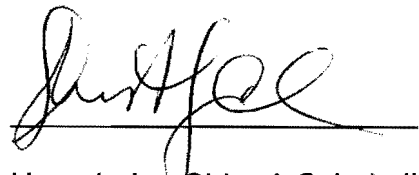
IT IS HEREBY AGREED THAT:

1. Pursuant to Federal Rule of Civil Procedure 15(a)(2) Defendants Mansef, Inc. and 6721851 Canada Inc., and D.C.I. Daily Capital Investment, Froytal Services Limited, and 9219-1568 Quebec Inc. consent to the filing of the Second Amended Complaint without the need for a motion seeking leave of the Court.

2. Mansef, Inc., 6721851 Canada Inc., D.C.I. Daily Capital Investment, Froytal Services Limited, and 9219-1568 Quebec Inc. agree to accept service of the Second Amended Complaint through their counsel Anderson Kill & Olick LLP via electronic mail to [mlane@andersonkill.com](mailto:mlane@andersonkill.com).

3. Mansef, Inc., 6721851 Canada Inc., and D.C.I. Daily Capital Investment, Froytal Services Limited, and 9219-1568 Quebec Inc. consent to jurisdiction and venue in the United States District Court for the Southern District of New York for purposes of this action.

SO ORDERED



Hon. Judge Shira A Scheindlin

Dated: October 5, 2010

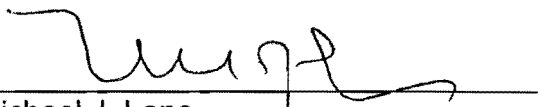
DATED: October 4, 2010



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(212) 891-1600

*On Behalf of Plaintiff Ventura Content AVV*

A handwritten signature in black ink, appearing to read 'Michael J. Lane', is written over a horizontal line.

Michael J. Lane  
Kanishka Agarwala  
Dennis J. Nolan  
ANDERSON KILL & OLICK P.C.  
1251 Avenue of the Americas  
New York, NY 10020  
(212) 278-1000

*On Behalf of Defendants Mansef, Inc.,  
6721851 Canada Inc., D.C.I. Daily Capital Investment,  
Froytal Services Limited, and 9219-1568 Quebec Inc.*